

## RE: Davison v. LCBOS - Defendants' Objections to Plaintiff's Discovery

Julia Judkins <JJudkins@bmhjlaw.com>

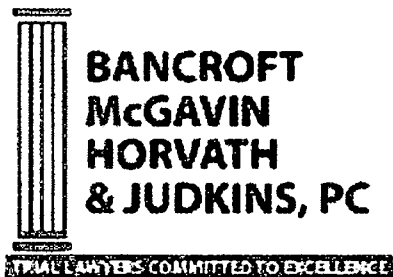
Wed 2/8/2017 1:32 PM

To: Brian Davison <bcdavison@hotmail.com>; Mary Meraw <MMeraw@bmhjlaw.com>;

Mr. Davison,

I raised the objections because they have to be raised within a certain time. But the Board and Ms. Randall are working on responses even as we speak. I anticipate having them to you by the due date. May I suggest that I get the responses to you and then we can discuss whether we need to argue about anything?

Julia B. Judkins



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**From:** Brian Davison [mailto:bcdavison@hotmail.com]  
**Sent:** Wednesday, February 08, 2017 1:31 PM  
**To:** Mary Meraw; Julia Judkins  
**Subject:** Re: Davison v. LCBOS - Defendants' Objections to Plaintiff's Discovery

Ms. Judkins,

Attached is a draft of my arguments against these objections.

Local Rule 37 requires that I confer with you on these objections prior to a motion to compel. I accept your objections with regard to conversations between defendants and counsel and during legislative meetings. However, the overall substance or subject of any meetings including closed meetings are not privileged. This includes any votes. And any discussion related to a specific action (e.g. Randall's blocking of me on her FB page) is administrative in nature, not legislative.

Please let me know if you intend to provide answers and documents so that I may draft a motion to compel.

Also, as I indicated previously, I do not have authorization to issue a subpoena. You previously indicated you would issue those subpoenas to Facebook employees so that we didn't have to hold a hearing in court. Will you issue the subpoenas as previously discussed or concur with a motion to waive a hearing on my motion for leave to file the subpoena so that I subpoena the Facebook employees?

Regards,  
Brian Davison

**From:** Mary Meraw <MMeraw@bmhlaw.com>  
**Sent:** Wednesday, February 8, 2017 11:38 AM  
**To:** Brian Davison  
**Subject:** Davison v. LCBOS - Defendants' Objections to Plaintiff's Discovery

Mr. Davison –

Please see attached Defendants' Objections to Plaintiff's Interrogatories and Requests for Production of Documents. Hard copy to follow via regular mail.  
Thank you for your kind attention to this matter.



Mary D. Meraw

*Legal Assistant to Julia B. Judkins, Esquire*



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